

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. KAROLINA MARCINIAK-DOMINGUES)
GONCALVES AGRA and MR. PEDRO)
MARCINIAK-DOMINGUES GONCALVES AGRA,)

Plaintiffs,)

v.)

CENTER FOR BRAINS, MINDS AND MACHINES)
AT MASSACHUSETTS INSTITUTE OF)
TECHNOLOGY, *et al.*,)

Defendants.)

Case No. 1:22-cv-10959 (ALC)

DECLARATION OF GLEN SHOR

I, Glen Shor, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am currently the Executive Vice President and Treasurer of the Massachusetts Institute of Technology ("MIT"). I either have personal knowledge as to the facts and matters set forth in this Declaration or I have determined that such facts and matters are true and correct to the best of my knowledge on the basis of information obtained from various sources, including my own personal experience as Executive Vice President and Treasurer, organizational records, documents maintained by MIT in the regular course of its work, other information brought to my attention in the course of my employment, and/or organizational documents within my possession and/or control.

2. I make this Declaration in support of the motion of MIT to dismiss for lack of personal jurisdiction the Amended Complaint filed by Plaintiffs, in the above-captioned action.

3. If called to testify, I would testify to the facts established as of this date set forth in this Declaration.

4. MIT is a co-educational, privately endowed research university incorporated under the laws of Massachusetts and located in Cambridge, Massachusetts. MIT is dedicated to advancing knowledge and educating students in science, technology and other areas of interest to the world of the future. MIT is not a citizen of New York.

5. MIT has no physical presence in New York. It has no offices, facilities or operations in New York. MIT is not registered to do business in New York. MIT does not hold classes where the instructor is located in New York. For the current term, there are 11,920 registered undergraduate and graduate students at MIT. Of those, there are 807 students, or 6.77% of the total student population, that have a permanent residential address in New York. Through MITx, a non-profit trade association affiliated with MIT, MIT is offering this semester 61 online MIT courses available around the world, including in New York.

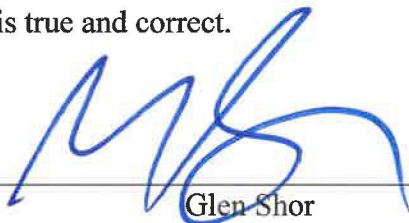
6. MIT has only 26 employees who have a permanent residential address in New York and work remotely in New York.

7. MIT is not required and does not maintain a registered agent for service of process in New York.

8. MIT does not develop advertisement or marketing campaigns specifically for New York.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14 day of December, 2023.


Glen Shor